STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

PAUL R. LEPAGE
GOVERNOR

PATRICIA W. AHO
COMMISSIONER

Futureguard Building Products, Inc.
Androscoggin County
Auburn, Maine
A-579-71-H-R (SM)

Departmental
Findings of Fact and Order
Air Emission License
Renewal

FINDINGS OF FACT

After review of the air emission license application, staff investigation reports, and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 Maine Revised Statutes Annotated (M.R.S.A.), §344 and §590, the Maine Department of Environmental Protection (the Department) finds the following facts:

I. REGISTRATION

A. Introduction

Futureguard Building Products, Inc. (Futureguard) has applied to renew their Air Emission License permitting the operation of emission sources associated with the preparation and surface coating of various metal, wood, plastic, and cloth products.

The equipment addressed in this license is located at 63 Omni Circle, Auburn, Maine.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Fuel Burning Equipment

Equipment	Maximum Capacity (MMBtu/hr)	Maximum Firing Rate (gal/hr)	Fuel Type, % sulfur	Install. Date	Stack #
Oven 2	1.5	16.6	LPG	1996	Oven 2
Oven 3	1.5	16.6	LPG	1999	Oven 3

Futureguard operates additional fuel burning units which have been identified as insignificant activities under 06-096 CMR 115, Appendix B and are not individually addressed in this air emission license. These include fuel burning equipment, each with a maximum capacity of less than 1.0 MMBtu/hour and two LPG-fired air makeup units above the 1.0 MMBtu/hour licensing threshold that exhaust inside the building.

Process Equipment

Equipment	Production Rate	Pollution Control Equipment	Stack #
Spray Booths 1, 2, 3, 4, 5, and 6	Variable by job	Particulate filters, HVLP spray guns	SB-1, SB-2, SB-3, SB-4, SB-5, and SB-6, respectively
Cloth Machine	Variable by job	--	C-1

Futureguard operates additional process units which have been identified as Insignificant Activities under 06-096 CMR 115, Appendix B, as follows:

- The vents in the Chemical Storage Area where coatings and solvents are stored are categorically exempt since the stored containers are normally closed [06-096 CMR 115, Appendix B, Section (A)(31)].
- The Powder Coating spray booths and Sandblast operation are insignificant since they are not vented outside the building.
- The LPG tanks are insignificant due to size (below 40,000 gallons). [06-096 CMR 115, Appendix B, Section (B)(8)]
- Batch Solvent Distillation is insignificant due to capacity (less than 55 gallons batch capacity). [06-096 CMR 115, Appendix B, Section (B)(13)]

C. Application Classification

The application for Futureguard does not include the licensing of increased emissions or the installation of new or modified equipment. Therefore, the license is considered to be a renewal of currently licensed emission units only and has been processed through *Major and Minor Source Air Emission License Regulations*, 06-096 Code of Maine Rules (CMR) 115 (as amended). With the facility-wide VOC and HAP limits, the facility is licensed below the major source thresholds and is considered a synthetic minor.

II. BEST PRACTICAL TREATMENT (BPT)

A. Introduction

In order to receive a license, the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in *Definitions Regulation*, 06-096 CMR 100 (as amended).

Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for existing emissions equipment means that method which controls or reduces emissions to the lowest possible level considering:

- the existing state of technology;
- the effectiveness of available alternatives for reducing emissions from the source being considered; and
- the economic feasibility for the type of establishment involved.

Process Description

Futureguard is a job shop that provides contract services for the preparation and surface coating of miscellaneous metal products, wooden products, plastic products, and cloth using conventional spray painting techniques, powder coating technology, and, for cloth, specialized machinery. The production areas within the facility include the following:

- A dip tank production area with iron phosphate batch dip tanks;
- Two powder paint areas where the items to be coated are given a charge, sprayed with powder coating, and then put through an oven;
- A spray paint production area with spray booths;
- A sand blasting area which includes an oxide blast room and a sand blast room (neither vent outside the building);
- A preparation area;
- A packing and quality assurance area; and
- A storage area.

The processes used in the production areas at any given time are job-specific. The jobs can vary from coating fencing and car chassis to applying coating to aerospace parts.

B. Ovens #2 and #3

1. Description

Ovens #2 and #3 are parts drying ovens each rated at 1.5 MMBtu/hour capacity firing LPG with a maximum firing rate of 16.6 gallons/hour. Oven #2, installed in 1996, is a convection oven and is located in one of the powder paint areas. Oven #3, installed in 1999, is an infrared oven and is located in the other powder paint area.

2. BPT Findings

The BPT emission limits for each of the propane ovens are based on the following:

Pollutant	Emission Factor	Source of Emission Factor
PM	0.2 lb/1000 gal	AP-42 Table 1.5-1 (dated 07/08) (PM, filterable)
PM_{10}	0.7 lb/1000 gal	AP-42 Table 1.5-1 (dated 07/08) (PM, total)
SO_2	0.10(S) lb/1000 gal	AP-42 Table 1.5-1 (dated 07/08)
NO_x	13 lb/1000 gal	AP-42 Table 1.5-1 (dated 07/08)
CO	7.5 lb/1000 gal	
VOC	1.0 lb/1000 gal	

Note: Some of the emission factors have changed from the previous license because the AP-42 factors have been updated based on most current data.

The BPT emission limits for Ovens #2 and #3 are the following:

Unit	PM (lb/hr)	PM_{10} (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Oven #2 1.5 MMBtu/hr; LPG	0.01	0.01	negligible	0.22	0.12	0.02
Oven #3 1.5 MMBtu/hr; LPG	0.01	0.01	negligible	0.22	0.12	0.02

Visible emissions from either Oven #2 or Oven #3 shall not exceed 10% opacity on a six-minute block average, except for no more than one six-minute block average in a three-hour period. [06-096 CMR 101]

C. Spray Booths 1-6

The six spray booths are each controlled by particulate filters and the use of HVLP (high volume, low pressure) spray guns. All of the spray booths are located in the spray paint production area. Spray Booths 1 and 2 were installed in 1987; Spray Booth 3 was installed in 1988; and Spray Booths 4, 5, and 6 were installed in 1995.

Emissions from the spray booths exhaust through the spray booth stacks. Emissions from air-drying of products are exhausted as fugitive emissions through the production area ventilation system.

BPT for the paint spray booths is the minimization of overspray with efficient HVLP spray guns and the use of filters to control PM emissions. VOC emission from spray painting shall be included in the 25.0 tons/year VOC facility emissions limit required in this license, based on a 12-month rolling total.

D. Cloth Machine

The Cloth Coating Machine was installed in 1989 to coat a variety of cloths and fabrics and is located in the dip tank production area. VOC emissions from cloth

coating shall be included in the 25.0 tons/year facility VOC emissions limit required in this license, based on a 12-month rolling total.

E. Adhesives

Futureguard uses adhesive coatings to adhere rubber to metal. VOC emissions from the adhesives shall be included in the 25.0 tons/year facility VOC emissions limit required in this license, based on a 12-month rolling total.

F. 06-096 CMR 129, *Surface Coating Facilities*

Futureguard is subject to 06-096 CMR 129, *Surface Coating Facilities*, which sets forth different VOC content requirements for surface coating of cans, fabrics, vinyl, metal furniture, flatwood paneling, and miscellaneous metal parts and products.

Due to the job shop nature of this business, 06-096 CMR 129, Section 3 is applicable, which states the following: "If more than one surface coating category and emission limitation applies to a specific coating operation, then the least stringent emission limitation shall control." Of the items Futureguard coats – fabric, vinyl, metal furniture, and miscellaneous metal parts; the least stringent emission limitation specified in 06-096 CMR 129 is for miscellaneous metal parts. Thus, Futureguard shall meet the following emission limitations, per 06-096 CMR 129 (3)(F):

Category	HAP Content	
	kg/l	lb/gal
Clear Coating	0.52	4.3
Steel Pail and Drum Interior	0.52	4.3
Air-dried Coating	0.42	3.5
Extreme Performance Coating	0.42	3.5
All Other Coatings	0.36	3.0

As stated in 06-096 CMR 129 (3)(G), Futureguard may use, in aggregate, up to 50 gallons of coatings that exceed the emission limitations in the table above for any 12 consecutive months, provided that records are maintained demonstrating compliance with the 50 gallon limit.

Futureguard has chosen to demonstrate compliance with 06-096 CMR 129 requirements using the daily-weighted average limitation as specified in the rule. If the facility decides to demonstrate compliance through either the low solvent content coating technology or add-on pollution control devices options as allowed under 06-096 CMR 129, an application shall first be submitted and approved by the Department.

Futureguard shall meet all applicable requirements of 06-096 CMR 129, including requirements of emission limitations, recordkeeping, and reporting.

G. 06-096 CMR 130, *Solvent Cleaners*

The requirements of 06-096 CMR 130, *Solvent Cleaners*, are applicable to solvent cleaners, as defined in the rule. Futureguard may use solvent-based solutions to clean certain components of the manufacturing process. The facility shall not use VOC-containing solvents for cleanup purposes unless equipment is used to collect the cleaning solutions and minimize their evaporation to the atmosphere. Measures to minimize potential emissions from cleaning operations are addressed under the work practice standards of Section (4)(B) of 06-096 CMR 129.

H. 06-096 CMR 159, *Control of Volatile Organic Compounds from Adhesives and Sealants*

The requirements of 06-096 CMR 159, *Control of Volatile Organic Compounds from Adhesives and Sealants*, are not applicable to any process line at this facility. This rule is applicable to uses – for compensation – within Maine of any adhesive, sealant, adhesive primer, or sealant primer. No material is used at this facility as an adhesive, sealant, adhesive primer, or sealant primer, as defined in this rule.

I. Hazardous Air Pollutants (HAP) Emissions

Futureguard is not a major source of HAP emissions; thus, units at the facility are not subject to the NESHAP regulations 40 CFR Part 63, Subparts JJJJ, MMMM, OOOO, or PPPP.

Facility-wide HAP emissions shall not exceed 9.9 tons/year of any single HAP and shall not exceed 24.9 tons/year of total HAPs, based on a 12-month rolling total. Records shall be maintained of the amount of coatings, paints, and adhesives used; the HAP content of each coating, paint, and adhesive; and the 12-month rolling total of individual and total HAP emissions.

J. Annual Emissions

1. Futureguard shall be restricted to the following annual emissions, based on a 12-month rolling total:

Total Licensed Annual Emissions for the Facility
Tons/year
(used to calculate the annual license fee)

	PM	PM_{10}	SO_2	NO_x	CO	VOC	Any Single HAP	Total HAP
Oven #2	0.04	0.04	--	1.0	0.53	0.09	--	--
Oven #3	0.04	0.04	--	1.0	0.53	0.09	--	--

	PM	PM_{10}	SO_2	NO_x	CO	VOC	Any Single HAP	Total HAP
Coatings and Adhesives Application Processes	--	--	--	--	--	24.8	--	--
Total TPY	**0.1**	**0.1**	**--**	**2.0**	**1.1**	**25.0**	**9.9**	**24.9**

2. Greenhouse Gases

Greenhouse gases are considered regulated pollutants as of January 2, 2011, through 'Tailoring' revisions made to EPA's *Approval and Promulgation of Implementation Plans,* 40 CFR Part 52, Subpart A, §52.21 *Prevention of Significant Deterioration of Air Quality* rule. Greenhouse gases, as defined in 06-096 CMR 100 (as amended), are the aggregate group of the following gases: carbon dioxide, nitrous oxide, methane, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. For licensing purposes, greenhouse gases (GHG) are calculated and reported as carbon dioxide equivalents (CO_2e).

Based on the worst case emission factors from AP-42, IPCC (Intergovernmental Panel on Climate Change), and *Mandatory Greenhouse Gas Reporting*, 40 CFR Part 98, and the global warming potentials contained in 40 CFR Part 98, Futureguard is below the major source threshold of 100,000 tons of CO_2e emissions per year. No additional licensing requirements are needed to address GHG emissions at this time.

III. AMBIENT AIR QUALITY ANALYSIS

The level of ambient air quality impact modeling required for a minor source is determined by the Department on a case-by case basis. In accordance with 06-096 CMR 115, an ambient air quality impact analysis is not required for a minor source if the total emissions of any pollutant released do not exceed the following levels and there are no extenuating circumstances:

Pollutant	Tons/Year
PM_{10}	25
SO_2	50
NO_x	50
CO	250

The total facility licensed emissions are below the emission levels contained in the table above, and there are no extenuating circumstances; therefore, an ambient air quality impact analysis is not required as part of this license.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards, and
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License A-579-71-H-R subject to the following conditions.

Severability. The invalidity or unenforceability of any provision of this License or part thereof shall not affect the remainder of the provision or any other provisions. This License shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

STANDARD CONDITIONS

(1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions (38 M.R.S.A. §347-C).

(2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 115. [06-096 CMR 115]

(3) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both. [06-096 CMR 115]

(4) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request. [06-096 CMR 115]

(5) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 M.R.S.A. §353-A. [06-096 CMR 115]

(6) The license does not convey any property rights of any sort, or any exclusive privilege. [06-096 CMR 115]

(7) The licensee shall maintain and operate all emission units and air pollution systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions. [06-096 CMR 115]

(8) The licensee shall maintain sufficient records to accurately document compliance with emission standards and license conditions and shall maintain such records for a minimum of six (6) years. The records shall be submitted to the Department upon written request. [06-096 CMR 115]

(9) The licensee shall comply with all terms and conditions of the air emission license. The filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for a renewal of a license or amendment shall not stay any condition of the license. [06-096 CMR 115]

(10) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license. [06-096 CMR 115]

(11) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:

A. Perform stack testing to demonstrate compliance with the applicable emission standards under circumstances representative of the facility's normal process and operating conditions:
   1. within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions; or
   2. pursuant to any other requirement of this license to perform stack testing.

B. Install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and

C. Submit a written report to the Department within thirty (30) days from the date of test completion.

[06-096 CMR 115]

(12) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicate emissions in excess of the applicable standards, then:

A. Within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and

B. The days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and

C. The licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.

[06-096 CMR 115]

(13) Notwithstanding any other provisions in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement. [06-096 CMR 115]

(14) The licensee shall maintain records of malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emissions unit itself that would affect emissions and that is not consistent with the terms and conditions of the air emission license. The licensee shall notify the Department within two (2) days or the next state working day, whichever is later, of such occasions where such changes result in an increase of emissions. The licensee shall report all excess emissions in the units of the applicable emission limitation. [06-096 CMR 115]

(15) Upon written request from the Department, the licensee shall establish and maintain such records, make such reports, install, use, and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such a manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status. [06-096 CMR 115]

SPECIFIC CONDITIONS

(16) Ovens #2 and #3

A. Each of these two ovens is licensed to fire LPG. Fuel use records shall be maintained on both a monthly and a 12-month rolling total basis. [A-579-71-F-R (8/26/2008), BPT]

B. Emissions from Ovens #2 and #3 shall not exceed the following [06-096 CMR 115, BPT]:

Unit	PM (lb/hr)	PM_{10} (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Oven #2 1.5 MMBtu/hr; LPG	0.01	0.01	negligible	0.22	0.12	0.02
Oven #3 1.5 MMBtu/hr; LPG	0.01	0.01	negligible	0.22	0.12	0.02

C. Visible emissions from either Oven #2 or Oven #3 shall not exceed 10% opacity on a six-minute block average, except for no more than one six-minute block average in a three-hour period. [06-096 CMR 101]

(17) Spray Booths

A. At all times that paint is being sprayed within a Spray Booth, the space shall be vented through the particulate filters associated with that Spray Booth. [06-096 CMR 115, BPT]

B. Visible emission from the Spray Booths and painting process vents shall not exceed 5% opacity on a six minute block average basis. [A-579-71-F-R (8/26/2008), BPT]

C. Futureguard shall implement an inspection and maintenance program for optimum particulate filter effectiveness for each Spray Booth as follows [06-096 CMR 115, BPT]:

1. Inspect spray booth filters on a weekly basis.

2. Replace spray booth filters when necessary, with the filters being replaced at least every two months.

   If a spray booth has not been used in a two-month period, the filters do not need to be replaced. In such cases, inspection of the filters and the unused status of the spray booth shall be documented in the inspection and maintenance log.

3. Document all inspection, replacement, and maintenance activities in an inspection and maintenance log. This log must be kept on-site and made readily available to a Department inspector or other Department representative upon request.

(18) **Total Process Emissions of VOC and HAP**

A. VOC Emissions [A-579-71-F-R (8/26/2008), BPT]

1. VOC emissions from paints, coatings, and adhesives used at the facility shall not exceed 25.0 tons/year, based on a 12-month rolling total.

2. Futureguard shall maintain monthly records of the total water-based paints and coatings, solvent-based paints and coatings, and adhesives used; and the VOC content of each. These records shall specify the monthly and 12-month rolling total of VOC emissions from the facility assuming 100% of the VOC content is released to the atmosphere.

B. HAP Emissions [A-579-71-F-R (8/26/2008), BPT]

1. HAP emissions from paints, coatings, and adhesives applied at the facility shall not exceed 9.9 tons/year of any single HAP or 24.9 tons/year of total HAPs, based on a 12-month rolling total.

2. Futureguard shall maintain monthly records of the total water-based paints and coatings, solvent-based paints and coatings, and adhesives used; and the HAP content of each. These records shall specify the monthly and 12-month rolling total of emissions of each HAP and of total HAPs from the facility assuming 100% of the HAP content is released to the atmosphere.

(19) **Surface Coating Facilities, 06-096 CMR 129**

A. Futureguard shall comply with all applicable requirements in 06-096 CMR 129.

B. Futureguard shall not use any coating with VOC content that exceeds the following limitations, except as allowed in Condition (19)(C):

Category	HAP Content	
	kg/l	lb/gal
Clear Coating	0.52	4.3
Steel Pail and Drum Interior	0.52	4.3
Air-dried Coating	0.42	3.5
Extreme Performance Coating	0.42	3.5
All Other Coatings	0.36	3.0

[06-096 CMR 129 (3)(F)]

C. Futureguard may use up to 50 gallons per year in aggregate, based on a 12-month rolling total, of coatings that exceed the emission limits set forth in Condition (19)(B) above, provided that Futureguard maintains records of such coatings in accordance with 06-096 CMR 129 (7)(B)(2) to document compliance with the stipulations of this exception. [06-096 CMR 129 (3)(G)]

D. Handling, Storage, and Disposal of Materials Containing VOC

1. Vapor-tight containers shall be used for the storage of spent or fresh VOC-containing substances and for the storage or disposal of cloth or paper impregnated with VOC-containing substances that are used for surface preparation, clean-up, or coating removal. [06-096 CMR 129 (4)(A)]

2. Futureguard shall not use VOC-containing solvent for cleanup operations unless equipment is used to collect the cleaning compounds and to minimize their evaporation to the atmosphere.

3. Futureguard shall comply with the following work practice standards [06-096 CMR 129 (4)(B)]:
   a. **Spray gun cleaning.** Futureguard shall collect all organic solvent used to clean spray guns into a normally closed container.
   b. **Line cleaning.** Futureguard shall pump or drain all organic solvent used for line cleaning into a normally closed container.
   c. **Spray booth cleaning.** Futureguard shall not use compounds containing more than 8.0% by weight of VOC for cleaning spray booth components other than conveyers, continuous coaters and their enclosures, and/or metal filters, unless the spray booth is being refurbished. If the spray booth is being refurbished – that is, the spray booth coating or other material used to cover the booth is being replaced – the affected source shall use no more than 1.0 gallon of organic solvent to prepare the booth prior to applying the booth coating.
   d. **Wash-off operations.** Futureguard shall control emissions from wash-off operations by using normally closed tanks for wash-off and minimizing dripping by tilting or rotating the part to drain as much organic solvent as possible.

E. Daily Weighted Average Limitation

1. Futureguard shall demonstrate compliance through a daily weighted average limitation as specified in 06-096 CMR 129. If the facility chooses to demonstrate compliance through either the low solvent content coating technology or add-on pollution control devices options as allowed under 06-096 CMR 129, an application shall first be submitted and approved by the Department. [06-096 CMR 129]

2. During any given day, Futureguard shall not apply coatings on that coating unit whose daily-weighted average VOC content exceeds the applicable emission limitations in condition (19)(B), as calculated according to 06-096 CMR 129, Appendix A, Procedure C. Daily weighted cross-line averaging may be allowed on a case-by-case basis **upon approval** from the Department and EPA. Weekly weighted averaging may also be allowed on a case-by-case basis **upon approval** from the Department and EPA, and shall be calculated in accordance with Appendix A, Procedure C, substituting "weekly" for "daily", as appropriate. [06-096 CMR 129 (5)(B)]

F. Test Methods and Compliance Procedures [06-096 CMR 129 (6)]

1. Futureguard shall collect and record the applicable information and, where required, perform compliance testing and demonstrate compliance by using the methods and procedures described in 06-096 CMR 129, Appendix A, Procedures A through I, and submit a report to the Department presenting the results as stipulated in 06-096 CMR 129 (8). At least a 30-day advance notification to the Department shall precede all tests.

2. Futureguard shall perform additional testing and submit a report within 90 days of receipt of notice from the Department if equipment operating parameters, staff inspection, air monitoring, or other evidence indicates to the Department that the surface coating facility may be operating out of compliance with the emission limitations.

G. Recordkeeping [06-096 CMR 129 (7)(B)(3)]

1. Daily records shall be maintained on the premises to document the name and identification of each coating, the mass of VOC per volume, and the volume of each coating, excluding water and exempt compounds, as applied, on each coating unit, line, or operation; and

2. Daily records shall be maintained on the premises to document the daily-weighted average VOC content of all coatings, as applied, on each coating unit, line, or operation, calculated according to 06-096 CMR 129, Appendix A, Procedure C.

H. Reporting

If VOCs are emitted in excess of licensed limitations, Futureguard shall notify the Department in writing within 30 calendar days of any evidence showing excess emissions and/or non-compliance with the daily-weighted average limitations. [06-096 CMR 129 (8)(B)(2)]

(20) **Annual Emission Statement**

In accordance with *Emission Statements*, 06-096 CMR 137 (as amended), the licensee shall annually report to the Department the information necessary to accurately update the State's emission inventory by means of either:

1. A computer program and accompanying instructions supplied by the Department; or
2. A written emission statement containing the information required in 06-096 CMR 137.

The emission statement must be submitted as specified by the date in 06-096 CMR 137.

(21) Futureguard shall notify the Department within 48 hours and submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component causes a violation of any emission standard (38 M.R.S.A. §605).

DONE AND DATED IN AUGUSTA, MAINE THIS 13 DAY OF December , 2013.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Marc Allen Robert Cone for
PATRICIA W. AHO, COMMISSIONER

The term of this license shall be ten (10) years from the signature date above.

[Note: If a renewal application which is determined by the Department as complete is submitted prior to expiration of this license, then pursuant to Title 5 MRSA §10002, all terms and conditions of the license shall remain in effect until the Department takes final action on the license renewal application.]

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: June 5, 2013
Date of application acceptance: June 6, 2013

Date filed with the Board of Environmental Protection:

This Order prepared by Jane E. Gilbert, Bureau of Air Quality.

Filed
DEC 16 2013
State of Maine
Board of Environmental Protection